

December 21, 2010

Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue, N.W. Washington, D.C. 20551

Sent Via Email to: regs.comments@federalreserve.gov

Re: Proposed Changes to Credit Insurance Disclosures under Regulation Z and the Truth-in-Lending Act Docket No. R-1390

Dear Members:

Mobiloil Federal Credit Union represents 49,000 hard working men, women and children in southeast Texas. Over our 75 years in service, our members have entrusted us to watch over \$370,000,000 in assets that have become a self-sufficient economic engine for southeast Texas.

As representative of these members, I wish to urge you to take caution when proposing changes to credit insurance disclosures under Regulation Z and the truth-in-lending act. While I totally support full disclosure on any product I feel your suggested format and choice of words are negatively biased and may cause our members confusion as to the real value of the product.

Additionally, the language as written would discourage members who do not have alternative forms of insurance or even worse, not qualify for insurance all together. This disclosure can put the member's financial future at risk for no apparent reason other than bureaucracy.

We urge the Federal Reserve to take the concerns of the hard working men and women as represented by Mobiloil Federal Credit Union under advisement as you consider this new disclosure.

Sincerely,

George Perrett Marketing Director

Mobiloil Federal Credit Union